

MAR 17 1995

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY**

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the time lines set forth in the NPRM are unrealistic, especially since standards have not been developed.<sup>3</sup>

(3) Large equipment manufacturers note that the implementation of 911 service in a wireless environment is more difficult than in a traditional wired environment and that resolution of the various difficulties will necessitate manufacturers, service providers and trade associations and carriers working on universal standards and interfaces for 911 service.<sup>4</sup>

Thus, a general theme of the comments is that the availability of universal wireless E911 service is a admirable goal and one that is shared by all. The industry realizes however that the goal is tempered by reality -- wireless technology is simply different than that of traditional landline services. The NPRM envisions universal availability of 911 services wherein a person can roam from system to system and expect to receive a wide variety of E911 service, including location information. The vision cannot become reality merely by regulatory mandate. In order to transform the vision to reality industry standards and uniform interfaces must be developed.

Uniform industry standards are necessary in order to provide the type of universal availability described in the NPRM. The need for uniform standards and interfaces is recognized by the carriers, the equipment manufacturers and some municipal

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<sup>3</sup>See e.g., Rural Cellular Association, pp. 4-6, 8; United States Cellular Corporation, pp. 3-4, 10-11; Cellular Telephone Industry Association, pp. 6-18; Bell Atlantic, pp. 8-12; Bell South, pp. 11-13, 15-19.

<sup>4</sup>See e.g., Motorola, Inc. pp. 13-17; Ericsson Corporation, pp. 2, 4-5, 8-10; Northern Telecom Inc. pp. 6-9, 16-18, 20-21, 43, 54-60; See also, Telecommunications Industry Association, pp. 22-23.

organizations.<sup>5</sup> As the ALAMO Council of Governments states "The FCC should explicitly require the standard setting bodies to devise a single standard, that is uniform across all wireless technologies, for delivery of calling party location information."<sup>6</sup> The municipalities note that it would be "unreasonable to require local political subdivisions to spend precious resources to configure their systems to be compatible with a multitude of signalling protocols and interfaces".<sup>7</sup>

Thus, SBMS again urges the Commission to give the industry standards committees and industry forums the opportunity to work the issues and allow additional research and testing of the resulting technologies to take place.<sup>8</sup> The time lines set forth in the NPRM are simply unrealistic and will result in patchwork technologies being deployed prior to adequate testing in order to meet regulatory mandated deadlines.<sup>9</sup> Instead, the Commission should follow the recommendation of the Cellular Telecommunications Industry Association and establish an industry advisory committee to devise a consensual solution that will provide a uniform E911 platform.<sup>10</sup>

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<sup>5</sup>See, fn. 2 and 3 supra; See also Alamo Area Council of Governments, p. 2.

<sup>6</sup>ALAMO Area Council of Governments, p. 2.

<sup>7</sup>Id.

<sup>8</sup>See SBC Comments, pp. 7-9, 10-23.

<sup>9</sup>Id.

<sup>10</sup>Cellular Telecommunications Industry Association, pp. 17-18.

**II. THE COMMISSION SHOULD NOT BE CONFUSED BY MISSTATEMENTS OF FACT REGARDING ACTIONS TAKEN TO PREVENT FRAUD**

Given the importance of this rulemaking, it is important that the Commission is not confused by misstatements of fact by commentators who lack an understanding of wireless technology. The comments of Consumers First and the Ad Hoc Alliance for Public Access to 911 ("Ad Hoc") misrepresent to the Commission that actions taken by Cellular One in Washington, D.C. in response to a rash of cellular fraud in the New York City area resulted in Cellular One customers who are roaming in New York City not being able to access 911. Such misrepresentations indicate a reckless disregard for the truth.<sup>11</sup>

The Ad Hoc comments do not state any basis for their assumption that roamer access to 911 service was cut off. As noted in the attached affidavit, the steps taken by Cellular One of Washington did not result in a blocking of 911 services.<sup>12</sup> Callers were able to place 911 calls which is directly contrary to the statements by Ad Hoc. Cellular One of Washington coordinated with the carrier in New York City and tested to assure 911 accessibility prior to taking the action.<sup>13</sup> Cellular One of Washington customers did not have to first establish a separate service agreement with

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<sup>11</sup>Ad Hoc cites a USA Today article regarding cellular fraud. The article, a copy of which is attached hereto as Exhibit 1, did not mention 911 accessibility.

<sup>12</sup>See affidavit of Mark Faris, Vice President of Operations Cellular One-Washington/Baltimore attached hereto as Exhibit 2.

<sup>13</sup>Id.

the New York carrier to gain 911 accessibility.<sup>14</sup> The claims regarding 911 accessibility in the Ad Hoc comments concerning Cellular One of Washington are simply untrue and should be disregarded by the Commission.

#### CONCLUSION

For the reasons stated herein and in SBMS' initial comments, the Commission should allow standard committees and industry forums to work through the problems associated with wireless 911 service, and should establish an industry advisory committee to work towards the goal of broadening the availability of enhanced 911 services to users of wireless technologies.

Respectfully submitted,

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March 17, 1995

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<sup>14</sup>Id.

USA TODAY

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# Phone fraud safeguards

## Alarms, ID codes

Bandits, who for years have preyed on the cellular phone industry, are finding it more difficult these days.

The industry is going on the attack and erecting tougher high-tech defenses to staunch the more than \$1 million a day it loses to fraud.

Companies are targeting thieves who use "counterfeit" phones to make calls that are billed to legitimate customers. Among the features they are installing to prevent and detect such fraud:

► Personal identification numbers. They are given to customers and must be entered when a phone call is placed. They can't be stolen via the airwaves.

► Phone prints. The process gives transmissions "fingerprints" so only legitimate customers can make calls.

► Fraud-detection software. These computer programs monitor cellular calls and identify unusual patterns, such as exceptionally long calls, high volumes of calls and two calls made at the same time on the same line.

Some software also enables companies to pinpoint for police where the fraudulent call is being placed.

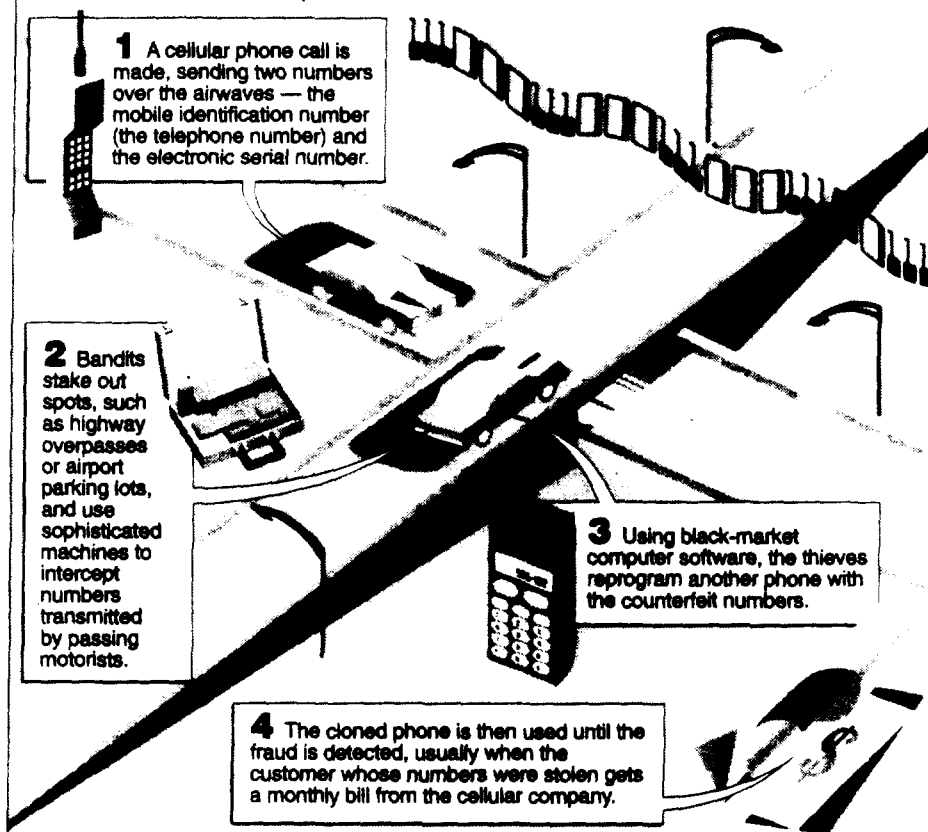
Every day a cellular bandit is arrested, says Mike Houghton, spokesman for the Cellular Telecommunications Industry Association. "It's a high-tech war against high-tech crooks," he says. "Cloning is definitely the crime of the '90s."

Stealing phone signals is profitable and drug dealers and others can operate anonymously. Bandits in New York make up to \$1,000 a day by allowing others to make counterfeit calls.

And the wireless communication industry is a target be-

## Capturing cellular numbers

How thieves steal cellular telephone numbers:



Source: USA TODAY research

By Marty Baumann and Stephen Conley, USA TODAY

cause it has 20 million users with 17,000 being added daily. Cellular fraud is growing 20% annually.

The primary problem for customers is the inconvenience of having their phones reprogrammed.

But occasionally, companies are forced to suspend services in an area because theft is such a problem. For example, Cellular One, a Washington-area cellular telephone carrier, this week temporarily suspended a service that enables customers to use their phones in the New York City area.

The company's recently installed fraud-detection soft-

ware identified a high number of New York-based calls that appeared to be fraudulent.

The suspension — which allows the company time to investigate the cases — is expected to be lifted in about three weeks, says Walter Patterson, spokesman for SBC Communications, Cellular One's parent company.

New York-based Nynex's cellular unit suspended service in Miami a year ago. It still hasn't been lifted. Nynex customers who are in Miami must first call a company representative in New York to get clearance to make a call.

Nynex says it expects to lift the suspension once an effec-

tive fraud-prevention system is in place.

Bell Atlantic Mobile's PINs and fraud-detection systems reduced fraudulent calls by 35% between June and September, says Bob Johnson, vice president of the Washington-Baltimore Bell Atlantic office.

But despite the success of some systems, industry experts don't underestimate their adversaries.

"We come up with new technologies, and the crooks come up with different angles," Houghton says. "We're going to be fighting this problem for a long time."

— James Overstreet

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## How to thwart cellular-code rustlers

By taking simple precautions, you can greatly reduce your chances of becoming a victim of cellular telephone fraud, according to the Cellular Telecommunications Industry Association:

► Protect your mobile identification and electronic serial numbers like you would credit card and calling-card numbers. One way thieves get numbers is by finding documents, such as subscriber agreements, that include them.

► Lock the phone or remove the handset and cellular antenna before leaving your car with parking attendants or mechanics.

► While in your car, use the hands-free speaker system

or park in a lot where you are using the phone.

► Only allow reputable cellular service technicians to install or test your phone.

► Ask your cellular carrier to block long-distance calls or calls outside the U.S. if you don't plan on making them.

► Immediately report a stolen phone to both the police and your cellular carrier.

► Carefully read your monthly bill to spot unusual calls.

► If you begin receiving a lot of wrong-number calls or hang-up calls, your cellular numbers may have been copied. Notify your carrier.

— James Overstreet

Affidavit of Mark Faris                    §  
   §  
Anne Arudel, Maryland                   §

My name is Mark Faris. I am over 21 years of age and fully competent to declare, under oath, the following:

I am employed by Southwestern Bell Mobile Systems, Inc. d/b/a Cellular One-Washington/Baltimore, as Vice President of Operations.

In my capacity as Vice President of Operations I have personal knowledge of the circumstances regarding the steps taken by Cellular One-Washington/Baltimore to investigate the theft of cellular service occurring in New York City and state as follows:

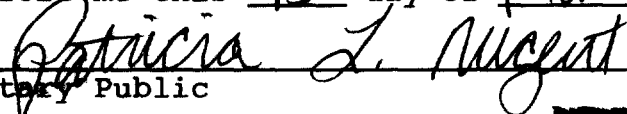
1. In December, 1994, Cellular One-Washington/Baltimore temporarily suspended roaming service to customers traveling in the New York City area. The suspension was to investigate a large increase in the theft of cellular service using Cellular One-Washington/Baltimore customer numbers occurring in the New York City area.
2. Prior to the suspension of service, Cellular One-Washington/Baltimore coordinated with McCaw Cellular Communications d/b/a Cellular One, the non-wireline cellular carrier in New York City regarding the suspension, including, but not limited to, testing to ensure that Cellular One-Washington/Baltimore customers in New York City would be able to access 911.
3. I have reviewed the comments of Consumers First and the Ad Hoc Alliance for Public Access to 911 filed in CC Docket 94-102 regarding the New York City situation. The statement that it was "virtually impossible for "roamers" to obtain 911 service" is without basis and untrue.
4. The suspension of roaming service described above did not result in the blocking of 911 calls from Cellular One-Washington/Baltimore customers in New York City. Cellular One customers entering the New York, NY MSA could place a 911 call during the suspension without first establishing a separate service agreement with the New York, New York carrier. Further, such customers were notified of the suspension of their normal roaming service prior to suspension taking effect.



Further Affiant sayeth not.

  
Mark Faris

Sworn and subscribed to  
before me this 15 day of March, 1995.

  
Notary Public

My Commission expires on: **NOTARY PUBLIC STATE OF MARYLAND**  
My Commission Expires August 18, 1997

p:\bruce\m-faris.aff

FCC Docket No. CC 94-102  
Certificate of Service

I hereby certify that a true and correct copy of the foregoing Reply Comments will be mailed via first class mail, postage prepaid, to the following party on the 17th day of March, 1995:

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c/o Dan Morales  
P.O. Box 12548, Capitol Station  
Austin, TX 78711-2548

GREATER HARRIS COUNTY 9-1-1 EMERGENCY NETWORK  
c/o Laverne Hogan  
602 Sawyer, Suite 710  
Houston, TX 77007

NATIONAL EMERGENCY NUMBER  
ASSOCIATION-TEXAS CHAPTER  
c/o J. Ross Sherohman  
P.O. Box 632911  
Nacogdoches, TX 75963-2911

TRW, INC.  
c/o Norman P. Leventhal  
David S. Keir  
Leventhal, Senter & Lerman  
2000 K Street, N.W.  
Suite 600  
Washington, DC 20006

US WEST, Inc.  
c/o Jeffrey S. Bork  
1020 19th Street, N.W., Suite 700  
Washington, DC 20036

UNITED STATES CELLULAR CORPORATION  
c/o Peter M. Connolly  
Koteen & Naftalin  
1150 Connecticut Ave., N.W.  
Washington, DC 20036

UNITED STATES COAST GUARD  
c/o J.D. Hersey, Jr.  
2100 Second St. S.W.  
Washington, DC 20593

UTC  
c/o Jeffrey L. Sheldon  
Thomas E. Goode  
1140 Connecticut Ave., N.W.  
Suite 1140  
Washington, DC 20036

ANACORTES POLICE DEPARTMENT  
c/o Michael L. King  
1011 - 12th Street  
Anacortes, WA 98221

COWLITZ COUNTY TECHNICAL SERVICES CENTER  
c/o Richard L. Bullock  
312 S. W. First Avenue  
Kelso, WA 98626-1724

DEPARTMENT OF COMMUNITY, TRADE  
AND ECONOMIC DEVELOPMENT  
c/o Robert G. Oenning  
P. O. Box 48346  
Olympia, WA 98504-8346

KING COUNTY E911 PROGRAM OFFICE  
c/o Marlys R. Davis  
700 Fifth Avenue, Suite 2300  
Seattle, WA 98104-5002

KING COUNTY POLICE COMMUNICATIONS  
c/o Captain John W. Beard  
516 Third Avenue  
Seattle, WA 98104-2312

PENINSULA COMMUNICATIONS  
PORT ANGELES POLICE DEPARTMENT  
c/o Naomi L. Wu  
321 East 5th Street  
Port Angeles, WA 98362

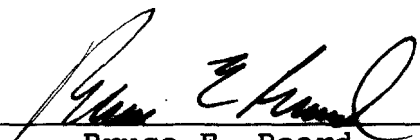
SAN JUAN COUNTY  
c/o David L. Zeretzke  
350 Court Street, #5  
Friday Harbor, WA 98250

THURSTON COUNTY DEPARTMENT  
OF COMMUNICATIONS  
c/o James C. Quackenbush  
2000 Lakeridge Dr. S.W.  
Olympia, WA 98502

WASHINGTON TRACER  
OREGON TRACER  
c/o Arthur A. Butler  
Sara Siegler-Miller  
ATER WYNNE HEWITT DODSON & SKERRITT  
601 Union Street, Suite 5450  
Seattle, WA 98101-2327

WATERWAY COMMUNICATIONS SYSTEMS, INC.  
c/o Martin W. Bercovici  
Keller and Heckman  
1001 G Street, N.W.  
Suite 500W  
Washington, DC 20001-4545

WESTINGHOUSE ELECTRIC CORPORATION  
Electronic Systems Group  
c/o James Carlsen  
P.O. Box 756 - MS A475  
Baltimore, MD 21203

  
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Bruce E. Beard